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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,	)	CASE NO. 07CR3056-WQH
	)	
Plaintiff,	)	DATE: DECEMBER 17, 2007
	)	TIME: 2:00 p.m.
v.	)	
	)	NOTICE OF MOTIONS AND
ELOISE BIERLY,	)	MOTIONS:
	)	
Defendant.	)	(1) COMPEL DISCOVERY; AND
	)	(2) FOR LEAVE TO FILE FURTHER
	)	MOTIONS

**TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND  
PAUL COOK, ASSISTANT UNITED STATES ATTORNEY:**

PLEASE TAKE NOTICE that on December 17, 2007, at 2:00 p.m., or as soon thereafter as counsel may be heard, the defendant, Eloise Bierly, by and through her counsel, Frederick M. Carroll, will ask this Court to enter an order granting the following motions.

**MOTIONS**

The defendant, Eloise Bierly, by and through her attorney, Frederick M. Carroll, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) compelling discovery; and,
- 2) granting leave to file further motions.

1        These motions are based upon the instant motions and notice of motions, the attached  
2 statement of facts and memorandum of points and authorities, and all other materials that  
3 may come to this Court's attention at the time of the hearing on these motion.

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5                                Respectfully submitted,

6                                /s/ Frederick M. Carroll

7 Dated: December 3, 2007

8                                **Frederick M. Carroll**  
9                                Attorney for Ms. Bierly